UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

LUMENICO LTD.

v.

Plaintiff,

Civil Action No. 2:15cv511

COMPASSCO, INC. and MARTIN LEENDERS,

Defendants.

AGREED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS

Compasso, Inc. ("Compasso") and Martin Leenders ("Leenders"), by counsel, moves this Court for an extension of time from January 25, 2016 to and including February 8, 2016 to file responsive pleadings to Plaintiff's Complaint. Counsel for both parties believe that a settlement agreement can be completed by February 8, 2016. Plaintiff's counsel, as evidenced by an Agreed Order attached as <u>Exhibit A</u> to this Motion, has agreed to the extension of time to file responsive pleadings.

For the reasons stated above, Compassoo and Leenders move this Court to enter the Agreed Order, attached as <u>Exhibit A</u>, which extends the deadline for filing responsive pleadings to the Complaint from January 25, 2016 to and including February 8, 2016.

COMPASSCO, INC. AND MARTIN LEENDERS

By: /s/Craig L. Mytelka

Craig L Mytelka (VSB # 31652)

cmytelka@williamsmullen.com

Williams Mullen

A Professional Corporation

222 Central Park Avenue, Suite 1700

Virginia Beach, Virginia 23462

757.499.8800 (telephone)

757.473.0395 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of January 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Ryan C. Posey, Esq. (VSB# 85109) Posey Lebowitz PLLC 3221 M. Street MW Washington, DC 20007 rposey@poseylebowitz.com

Glen M. Diehl, Esq. DIEHL LAW LLC 20 Shawnee Drive, Suite B Watchung, NJ 08833 gdiehl@diehltrials.com

and by e-mail to:

Brian L. Belles, Esq. The Belles Group, P.C. 1608 Walnut Street, Suite 1302 Philadelphia PA 19103 brian.belles@thebellesgroup.com

/s/Craig L. Mytelka
Craig L Mytelka (VSB # 31652)
cmytelka@williamsmullen.com
Williams Mullen
A Professional Corporation
222 Central Park Avenue, Suite 1700
Virginia Beach, Virginia 23462
757.499.8800 (telephone)
757.473.0395 (facsimile)

30034526 1.DOC